IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

THOMAS YOUNG, individually and on behalf of all others similarly situated, Plaintiff, v. LEAFFILTER NORTH OF MASSACHUSETTS, LLC and LEAFFILTER NORTH, LLC, Defendants.	))))))))))))))))	CASE NUMBER: 1:19–CV–10055

PLAINTIFF'S MOTION FOR CONDITIONAL CERTIFICATION

Pursuant to 29 U.S.C.A. § 216(b), Plaintiff, Thomas Young ("Young"), moves for

conditional certification of this collective action, and for an order authorizing notice to

issue to a putative class consisting of the following group of individuals:

> **All individuals who worked as Installers for LeafFilter North, LLC
> during the past three years who were classified as independent
> contractors.**

In support hereto, the Plaintiff submits his accompanying memorandum of law,

affidavit of Plaintiff's counsel Nicholas Schneider, affidavit of Plaintiff, Thomas Young,

proposed class notice and consent form, and proposed order.

WHEREFORE, the Plaintiff respectfully requests that this motion be **ALLOWED**.

Respectfully Submitted,
Plaintiff,
THOMAS YOUNG,
individually and on behalf of all others similarly situated,
By his attorney(s),

 /s/ Adam J. Shafran
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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

The undersigned counsel for the Plaintiff hereby certifies that on June 6, 2019

Plaintiff's counsel conferred with Defendant's counsel and attempted in good faith to

resolve or narrow the issue presented in the Plaintiff's motion.

/s/ Adam J. Shafran
Adam J. Shafran

CERTIFICATE OF SERVICE

I, Adam J. Shafran, certify that on June 6, 2019, I filed this document through the

ECF system and that notice will be electronically sent to all registered participants

identified on the Notice of Electronic Filing.

 /s/ Adam J. Shafran
Adam J. Shafran